

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ERNEST ANDRADE-BARTELDES, on behalf of  
himself and others similarly situated,

Plaintiff,

-against-

ASA COLLEGE, INC., ALEXANDER  
SHCHEGOL, and JOSE VALENCIA,

Defendants.

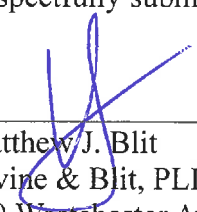
No. 1:23-cv-00495 (LJL)

NOTICE OF MOTION

**PLEASE TAKE NOTICE** that pursuant to Rule 23 of the Federal Rules of Civil Procedure, upon the Declaration of Matthew J. Blit, and all exhibits annexed thereto, upon the accompanying Memorandum of Law in Support thereof, and the Proposed Order annexed hereto as “Exhibit A”, plaintiff Ernest Andrade-Barteldes, on behalf of himself and others similarly situated, will move this Court before the Honorable Lewis J. Liman, at the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York 10007, for an Order granting preliminary approval of the proposed settlement agreement between the Class and Collective, and defendant Jose Valencia, and directing the proposed Class Notice to be distributed.

Respectfully submitted,

Dated: December 16, 2024  
Rye Brook, NY

  
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*Class Counsel*